

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

**DISH NETWORK L.L.C.**  
and **NAGRASTAR LLC**,

Plaintiffs,

v.

**DEBRA HENDERSON, JOHN  
HENDERSON, and BOOM MEDIA LLC**,

Defendants.

Case No. 5:19-CV-1310 MAD/ATB

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR DEFAULT JUDGMENT**

Please take notice that pursuant to Federal Rule of Civil Procedure 55(b)(2) Plaintiffs DISH Network L.L.C. and NagraStar LLC move the Court to enter default judgment against Defendants Debra Henderson, John Henderson, and Boom Media LLC as to Counts I and II of the complaint alleging violations of the Federal Communications Act, 47 U.S.C. §§ 605(a), (e)(4). The complaint and the Clerk's entry of default are attached as Exhibits 1-2, pursuant to L.R. 55.2(b).

Plaintiffs' motion is based on the concurrently filed memorandum of law, the supporting declarations of Kevin McMonnies, Michael Jaczewski, Gwendolyn Arguello, and Timothy Frank, and any other evidence or argument that the Court may consider. Plaintiffs' motion will be heard on **June 2, 2020 at 10:00 a.m.** before District Judge Mae D'Agostino in Courtroom 5 of the James T. Foley U.S. Courthouse, 445 Broadway, Albany, New York 12207. Pursuant to L.R. 55.2(b), Plaintiffs' proposed default judgment is attached as Exhibit 3.

Dated: April 22, 2020

Respectfully submitted,

s/ Timothy M. Frank

**HAGAN NOLL & BOYLE, LLC**

Timothy M. Frank (*pro hac vice*)

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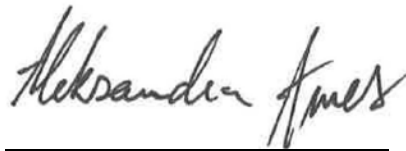
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Attorneys for Plaintiffs DISH Network  
L.L.C. and NagraStar LLC

**CERTIFICATE OF SERVICE**

I certify that on April 22, 2020, this notice of motion and motion for default judgment, along with the memorandum of law and declarations of Kevin McMonnies, Michael Jaczewski, Gwendolyn Arguello, and Timothy Frank referenced herein, along with all exhibits thereto, were served on Defendants Debra Henderson, John Henderson, and Boom Media LLC by mailing a copy to the address where each Defendant was served with Plaintiffs' summons and complaint.

A handwritten signature in black ink, appearing to read 'Aleksandra Ames', written over a horizontal line.

Aleksandra Ames